

REMARKS

The Applicant wishes to thank Examiner Kim for the courtesy and cooperation extended to the undersigned attorney during the telephone interview of June 16, 2003. The remarks that follow substantially reflect the arguments presented during the interview. Accordingly, reconsideration and allowance of pending Claims 1-6 and 22-26 are respectfully requested.

35 U.S.C. §102

Claims 1-6 and 22-26 are rejected under 35 U.S.C. §102(b) as being anticipated by Harari, et al. (U.S. Patent No. 5,887,145; hereafter "Harari"). Applicants respectfully traverse the rejection and further request that the rejection be reconsidered and withdrawn.

Harari relates to a personal computer ("PC") card having a PCMCIA form-factor PC mother card portion (col. 6, lines 63-67), which can be mated with an EEPROM memory chip daughter card (col. 7, lines 4-6 and 31-32).

Claim 1 recites an assembly comprising "a device physically sized in a form factor of a PCMCIA card, the device having an interface to communicate with a storage card and memory to store user data." The assembly further comprises "a removable storage card associated with a user that alternately enables access to the user data on the memory when interfaced with the device interface and disables access to the user data when removed from the device."

It is respectfully submitted that Harari fails to anticipate the claimed invention by failing to teach each and every feature of the claim, as required by MPEP 2131. More specifically, the rejection cites the mother card 10 (Fig. 1) as being a PCMCIA form-factor PC card having an interface to communicate with

1 storage card 20. However, mother card 14 does not have a memory to store user
2 data, which is acknowledged as follows, "The mother card 10 contains a memory
3 controller 40 but does not contain any substantial amount of flash EEPROM mass
4 storage," (col. 7, lines 37-39). Tellingly, the rejection is silent regarding the
5 inclusion of any such memory in the reference apparatus.

6 Rather, it is daughter card 20 that "contains essentially flash EEPROM
7 memory chip(s) 30 (col. 7, lines 31-32). Thus, assuming *arguendo*, that a
8 comparison is drawn between the removable storage card of Claim 1 and the
9 daughter card described by Harari, once daughter card 20 is removed from mother
10 card 10, there is no memory corresponding to mother card 10. Clearly then the
11 reference embodiment is fundamentally deficient with respect to independent
12 Claim 1. Moreover, since Claims 2-6 depend from Claim 1, it is further submitted
13 that the dependent claims are distinguishable from Harari for at least the reasons
14 set forth above as well.

15 Independent Claim 22 recites a computer system comprising "a computer
16 having a PCMCIA device reader," and "a smart card secured memory physically
17 sized in a form factor of a PCMCIA card to compatibly interface with the
18 PCMCIA device reader in the computer, the smart card secured memory assembly
19 having data memory to store user data and a removable smart card that alternately
20 enables access to the user data when present and disables access to the user data
21 when removed." Applicants submit that, for reasons similar to those discussed
22 above regarding independent Claim 1, Harari fails to anticipate Claim 22 and
23 corresponding dependent Claims 23-26.
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1 It is respectfully submitted that, for at least the reasons set forth above, the
2 proposed reference fails to teach all of the features presently claimed, and thus the
3 rejection under 35 U.S.C. §102(b) should be withdrawn.

4 **Conclusion**

5 The remaining references of record have been studied. It is respectfully
6 submitted that they do not compensate for the deficiencies of the reference
7 discussed above with regards to the pending claims.

8 All rejections having been addressed, it is respectfully submitted that all of
9 pending claims 1-6 and 22-26 are in condition for allowance. Early and forthright
10 issuance of a Notice to that effect is earnestly solicited. If any issues remain that
11 prevent issuance of this application, the Examiner is urged to contact the
12 undersigned attorney before issuing a subsequent Action.

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14 Respectfully submitted,

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